

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

QUINSTREET, INC.,)	
)	
Plaintiff/Counter-Defendant,)	
)	
v.)	C. A. No. 06-495-SLR
)	
EPICREALM LICENSING, LP,)	
)	
Defendant/Counter-Plaintiff.)	

**NOTICE OF RULE 30(b)(6) DEPOSITION
OF QUINSTREET, INC. (TOPIC NOS. 1-6)**

PLEASE TAKE NOTICE that on September 19, 2007 at 9:00 a.m. at the Garden Court Hotel, 520 Cowper Street, Palo Alto, California 94301, or at such other time and place as agreed by the parties, defendant and counter-plaintiff epicRealm Licensing, LP, pursuant to Fed. R. Civ. P. 26 and 30, shall take the deposition upon oral examination of plaintiff and counter-defendant QuinStreet, Inc. The deposition will continue from day to day until completed and shall be taken before a duly certified court reporter and notary public or other person authorized by law to administer oaths. The deposition will be recorded by stenographic, sound and video means.

Pursuant to Fed. R. Civ. P. 30(b)(6), QuinStreet, Inc. shall designate one or more officers, directors, managing agents or other representatives who consent to testify on its behalf, to testify to matters known or reasonably available to QuinStreet, Inc. regarding the topics listed herein. To the extent more than one deponent is identified, QuinStreet, Inc. shall state in advance of the deposition which portions of this notice each deponent is prepared to address.

Rule 30(b)(6) Deposition Topics

In accordance with Fed. R. Civ. P. 30(b)(6), epicRealm identifies the following matters for examination:

1. The identification of all QuinStreet's Web Products and Services, including but not limited to, all versions thereof.
2. For each of QuinStreet's Web Products and Services whose identity is requested in response to Topic No. 1, identify whether each of the following functionalities is present in each such QuinStreet Web Products and Services:
 - a. "software products that are used in conjunction with the delivery of dynamic web pages"
 - b. software capable of generating dynamic web pages
 - c. software that implements load balancing
 - d. software that receives hypertext transfer protocol requests
 - e. software used in conjunction with the hosting of websites
 - f. software that identifies requests for processing, determines which process should process a request, or routes or forwards a request.
3. The identification of every web site hosted by QuinStreet.
4. The identification of the entity that owns or compensates QuinStreet for the operation of each web site whose identity is requested in response to Topic No. 3 and/or the identification of the entity that controls the content of each web site whose identity is requested in response to Topic No. 3.
5. Whether each of the entities whose identity is requested in response to Topic No. 4 is located in the U.S.
6. The identification of every QuinStreet Web Products and Services purchased, licensed, or used by each of the entities whose identity is requested in response to Topic No. 4.

For purposes of Topic Nos. 1-6, "QuinStreet" means QuinStreet, Inc., plaintiff and counter-defendant in this action, and all predecessors, successors, subsidiaries, divisions, parents and/or affiliates thereof, past or present, and all past or present officers, directors, affiliates,

agents, employees, attorneys, consultants, representatives and any other person acting or purporting to act on behalf of QuinStreet.

For purposes of Topic Nos. 1-6, “QuinStreet’s Web Products and Services” and “QuinStreet Web Products and Services” means all software, products, activities, and/or services related to the creation, generation, management or delivery of dynamic web pages including but not limited to:

- a) QuinStreet’s systems for responding to requests for static and dynamic web pages;
- b) The platforms hosted by QuinStreet;
- c) QuinStreet’s systems and method for dynamic web page generation;
- d) QuinStreet’s software products that are used in conjunction with the delivery of dynamic web pages;
- e) All current and past versions of QuinStreet’s Corporate Business Management suite, Distributor Business Management suite, and Distributor Sales Management suite;
- f) Any software that incorporates, is based upon, or is used in conjunction with Apache HTTP Server, including but not limited to, Apache 1.3, and/or Apache 2.0, Tomcat application server or any other product providing comparable functionality with respect to the creation, generation, management or delivery of dynamic web pages;
- g) Any software capable of receiving, routing or processing hypertext transfer protocol requests, including but not limited to, software used to enable, manage and operate internet web sites, including but not limited to, company intranet(s), web browsers, web

servers, application servers, load balancers, content switches and packet switches associated with web content;

- g) Any products or services associated with QuinStreet's Web Site(s).
- i) Any database software capable of creating, generating, managing or delivering dynamic web pages; and
- j) Any products for use in conjunction with any product or service within subparts (a) - (i).

You are invited to attend and exercise your rights under the Federal Rules of Civil Procedure.

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Dated: August 31, 2007
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*Attorneys for Defendant
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CERTIFICATE OF SERVICE

I, David E. Moore, hereby certify that on August 31, 2007, the attached document was electronically filed with the Clerk of the Court using CM/ECF which will send notification to the registered attorney(s) of record that the document has been filed and is available for viewing and downloading.

I further certify that on August 31, 2007, I have Electronically Mailed the document to the following person(s):

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